

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)

UNITED STATES OF AMERICA

\*

VS.

\*

CASE NO. TDC 20-00033

WILLIAM GARFIELD BILBROUGH, IV

\*

**REPLY TO GOVERNMENT’S OPPOSITION TO MOTION TO REVIEW DETENTION  
ORDER AND ORDER RELEASE OF DEFENDANT**

The Defendant by and through his attorneys, Robert C. Bonsib, Esq. and Megan E. Coleman, Esq., respectfully submits this Reply to the Government’s Opposition to the Defendant’s Motion to Review Detention Order and Order Release of the Defendant and, as reasons in furtherance thereof, states as follows:

1. The Government’s Response fails to address the specific personal circumstances present in the Defendant’s case. The government raises the specter of a mass release of individuals from confinement and seeks to minimize the risk to the Defendant of being in a confined location with a medical condition that cannot be disputed puts him in a high risk category should he be exposed to the Coronavirus.
2. Interestingly governors are ordering the closure of restaurants, bars, movie theaters and gyms because of the concern that healthy people will be exposed to the virus. Areas of the United States are essentially on lockdown because of the fear of the virus.
3. The government casually says that there have been no confirmed cases of the virus at CTF, yet one only need watch any news show or read any newspaper or listen to a radio broadcast to know that “those in the know” in the government and, in particular, in public health agencies are providing dire predictions of what is going to occur in the next few weeks regarding the spread of the virus. They speak not in terms of “if” but rather in terms of

“when” and not in terms of how few people will become infected – but rather they assure us that large numbers of individuals will be infected – it only whether the numbers will be large, very large, massive or catastrophic.

4. William Bilbrough is a young man with no prior record. He is charged with a non-violent crime. He has a medical condition that requires him to wear a diabetic insulin pump. He has nowhere to go – particularly now that he needs to be extraordinarily careful about those with whom he has contact. The government says no virus in CTF yet. Great! So what does the government propose to do and to what degree will they assume responsibility when Bilbrough comes down with the virus. I’m sorry won’t cut it. This is a time of crisis. It is a time when the government is taking extraordinary steps to protect its people. It is also a time for the judicial system to recognize that the health of this young man should take priority.
5. The Pretrial Services Office is set up to monitor Bilbrough. To suggest that his release will somehow overburden that agency is false. Bilbrough is not charged with murder, drug distribution, use of weapons in criminal activity. He is charged with being in a car, sometimes as a passenger, occasionally driving someone else’s car, in which an individual who was not authorized to be in the United States was a passenger. He is charged with engaging in such conduct over a just a couple of days. To risk his health and perhaps his life is simply not necessary nor reasonable under these unusual circumstances.

WHEREFORE it is respectfully requested that this Honorable Court vacate the detention Order in this matter and to set appropriate conditions of release.

Respectfully submitted,

MARCUSBONSIB, LLC

*/s/ Robert C. Bonsib*

---

ROBERT C. BONSI, ESQ.  
6411 Ivy Lane, Suite 116  
Greenbelt, Maryland 20770  
robertbonsib@marcusbonsib.com  
(301) 441-3000  
Trial Bar No. 00324

*/s/ Megan E. Coleman*

---

MEGAN E. COLEMAN, ESQ.  
6411 Ivy Lane, Suite 116  
Greenbelt, Maryland 20770  
robertbonsib@marcusbonsib.com  
(301) 441-3000  
Trial Bar No. 17552

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing motion was filed, via ECF, this 18<sup>th</sup> day of March, 2020 to all parties of record.

*/s/ Robert C. Bonsib*

---

ROBERT C. BONSI